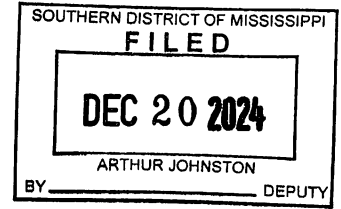


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI



QJR, LLC,

Plaintiff

Versus

CASE NO. 1:24cv383 TBM-RPM

SECURIX, LLC, and
JONATHAN MILLER, INDIVIDUALLY
AND AS CHAIRMAN OF SECURIX LLC,

Defendants

MOTION TO FILE EXHIBIT A TO NOTICE OF REMOVAL
UNDER RESTRICTION

NOW INTO COURT through undersigned counsel come defendants Securix, LLC and Jonathan Miller individually and in his capacity as chairman of Securix, LLC, and hereby move and represent as follows:

(1)

On or about September 20, 2024, QJR, LLC filed a petition in the Chancery Court of Jackson County, Mississippi bearing docket number 30CH1:24-cv-01774-DNH.

(2)

Defendants are removing this case to federal court. Pursuant to 28 USC 1446(A), defendants have attached a copy of the petition to their notice of removal as Exhibit A.

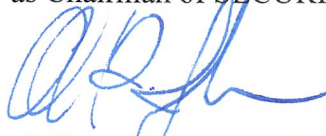
(3)

The state court has entered an *ex parte* order sealing the entire state court record, and in order to avoid violation of the order of the state court, your defendants respectfully ask this Honorable Court to order that Exhibit A to the notice of removal (the state court petition) be filed under restriction so that only this Honorable Court and parties to the case can view this Exhibit.

WHEREFORE defendants SECURIX, LLC and JONATHAN MILLER, INDIVIDUALLY AND AS CHAIRMAN OF SECURIX LLC respectfully ask that this Honorable Court order that Exhibit A appended to the Notice of Removal (the state court petition) be filed under restriction so that it can be viewed only by this Honorable Court and by the parties to this litigation.

Respectfully submitted, this the 20 day of December, 2024.

SECURIX, LLC and
JONATHAN MILLER, individually and
as Chairman of SECURIX, LLC

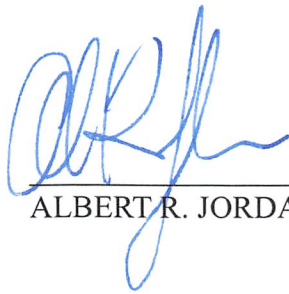


ALBERT R. JORDAN, IV
MS Bar Roll # 102513
HEALY & JORDAN, PLLC
1323 28th Avenue, Suite A
Gulfport, MS 39501
228-575-4005 - Telephone
228-575-4006 – Facsimile
EMAIL: Al@HealyJordanLaw.com

CERTIFICATE OF SERVICE

I do certify that I have this date, December 20, 2024, mailed through the United States Postal Service, postage prepaid, a true and correct copy of the above and forgoing to the following:

Jacklyn Wrigley
Erich N. Nichols
Nichols Wrigley, PLLC
929 Washington Ave
Ocean Springs, MS 39564
erich@nicholswrigley.com
jaklyn@nicholswrigley.com
office@nicholswrigley.com



ALBERT R. JORDAN, IV